

Document Log Item

Addressing	
From	To
"Steve Costa" <slcatgdc@earthlink.net>	"Jim Cox" <jcox@cosintl.com> Carl Goldstein/R9/USEPA/US@EPA
CC	BCC
Description Form Used: Memo	
Subject	Date/Time
Re: COS Samoa Packing Permit Issues	08/17/2009 10:42 AM
# of Attachments	Total Bytes
0	12,478
NPM	Contributor
	Marcela VonVacano
Processing	
Comments	

Body

Document Body

Thanks for the clarification, Carl.

Jim, can you provide a drawing of the active surface area that will be involved in the buying operation. If not I can probably put something together from the hydraulics report we did some years ago.

Steve

----- Original Message -----

From: <Goldstein.Carl@epa.gov>

To: "Jim Cox" <jcox@cosintl.com>

Cc: "Steve Costa" <slcatgdc@earthlink.net>
Sent: Monday, August 17, 2009 10:07 AM
Subject: RE: COS Samoa Packing Permit Issues

> With regard to the storm water permit, as I recall, it also
> included how
> clean the area is that would collect the storm water and then
> discharge.
> The canning plant across the road had a very small area that
> did collect
> and discharge, but it was very, very clean. Naturally, when we
> read the
> rules, it will be clear.
>
>
>
> "Jim Cox"
> <jcox@cosintl.co
> m> To
> "Steve Costa"
> 08/16/2009 11:43 <slcatgdc@earthlink.net>
> AM cc
> Carl Goldstein/R9/USEPA/US@EPA
> Subject
> RE: COS Samoa Packing Permit
> Issues
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> Steve,

>
> Thanks for your help in obtaining Carl's input. Our intent will
be to
> continue to keep the permits active and we will follow what
course is
> needed there. Regarding item 3 below, I would request that you
help us
> to fill out the exemption application and help us sheppard it
through.
>
> Regards,
>
> Jim
>
>
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>
> From: Steve Costa [mailto:slcatgdc@earthlink.net]
> Sent: Sunday, August 16, 2009 11:27 AM
> To: Jim Cox; Goldstein.Carl@epa.gov
> Subject: COS Samoa Packing Permit Issues
>
> Carl,
>
> Please review and make sure I am correctly interpreting our
> conversation.
> -----
>
> Jim,
>
> I have had a couple of phone conversations with Carl. The
following
> represent his evaluation at this time, but keep in mind that he
has
> submitted the letter to the permitting folks for a more
"official"
> evaluation. This could take some time.
>

> As suspected when you stop production at the cannery there are two
> courses of action you can take:
>
> [1] Simply notify EPA that you are no longer in business and wish to
> terminate (abandon your permits - NPDES and Ocean Dumping [OD]). There
> will be no further requirements. If someone buys the facility and wants
> to start production they would have to apply for a new permit(s). My
> feeling is that this might be problematic until the nitrogen and
> phosphorus water quality standards issues are settled. A new OD permit
> could be very difficult.
>
> [2] If you wish to maintain the permit for a possible sale of the plant,
> then all permit required monitoring will be required. As for the DMRs
> and OD reports, you would file those and simply check the "No Discharge"
> box or indicate no discharge in the appropriate places. All other
> requirements would remain in effect - however, I believe that if there
> is no processing then any internal plant monitoring would be in
> suspension until production starts -up. It is unclear to me at this
> time how EPA would view the routine Harbor and Ocean monitoring or how
> you would coordinate with StarKist since they will still be obligated to
> do that monitoring. I suspect EPA would accept the monitoring as in

> compliance for both permits - but I am not sure how that gets worked out
> between COS and StarKist. StarKist may object to submitting a
> monitoring report with COS as a co-submitter if they are paying for the
> whole thing. Obviously, I do not want to get conflicted between the two
> operations - so COS, StarKist, and EPA would need to work that out.
>
> [3] As for the storm water from the buying and storage operation, Carl
> has indicated that you can apply for an exemption/exclusion from a
> stormwater permit since there would be no identifiable point source
> discharge of pollutants. Evidently that is the existing situation for
> the can plant. There should be an application for that available online
> at the EPA web site. If not I believe a letter to EPA (through Carl)
> would suffice. I am not sure if this is the same thing as permitting
> under the EPA-Region 9 general storm water permit. I believe your best
> course of action is to fill a request for an exemption and continue with
> your planned operation as the details get worked out. Carl sees no
> downside to this approach at this time.
>
> Let me know if you would like gdc to follow up on item [3]
>
> Steve
>
>

